

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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Telecommunications Relay Services	)	CC Docket No. 03-123
and Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	
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ULTRATEC, INC. COMMENTS ON PROPOSED ALLOCATION FACTOR  
FOR INBOUND TWO-LINE CAPTIONED TELEPHONE CALLS  
AND CLARIFICATION OF EFFECTIVE DATE

**I. Cost Allocation Factor**

On July 14, 2005, the Federal Communications Commission (FCC or Commission) approved two-line captioned telephone service as a form of telecommunications relay service eligible for reimbursement from the Interstate Relay Fund administered by the National Exchange Carriers Administration (NECA).<sup>1</sup> In that Order, after acknowledging that captioned telephone providers are unable to determine the originating location for inbound two-line captioned telephone calls, the FCC determined that the same allocation methodology as is used for 800 and 900 number call minutes would apply to interstate inbound minutes incurred through these two-line services. To this end, the Commission directed NECA to determine and apply “an allocation factor for inbound two-line captioned telephone calls that is based on the relationship between interstate and

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<sup>1</sup> *In the Matter of Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CC Dkt. 98-67, CG Dkt. 03-123, FCC 05-141 (2005) (Order).

international traditional TRS calls and all intrastate, interstate, and international traditional TRS calls.”<sup>2</sup> On August 2, 2005, NECA complied with the Commission’s directive by proposing to allocate 11% of all inbound two-line captioned telephone minutes to the Interstate Fund and the remaining 89% to intrastate jurisdictions. On August 24, 2005, the FCC released a Public Notice seeking comment on this allocation factor.<sup>3</sup> Ultratec, Inc. approves of the proposed allocation factor. The national calling average for all interstate *outbound and inbound* TRS calls hovers around 22% , accordingly 11%, for approximately one half of all interstate two-line captioned telephone calls – for *inbound* interstate two-line calls only – would appear to be appropriate. We understand that NECA will determine the appropriate allocation factor for these calls on an annual basis. We also understand, pursuant to the FCC’s two-line captioned telephone order, that the Commission will continue to monitor usage data of both one and two-line captioned telephone calls to make sure that the allocation methodology appropriately reflects the use of these services.<sup>4</sup>

## II. Clarification on Effective Date Requested

Ultratec seeks clarification of the effective date of both the FCC’s Order on two-line captioned telephone services as well as the aforementioned cost allocation factor. Specifically, although the Order indicates its effective date to be thirty days after publication in the Federal Register, the FCC’s Public Notice on the allocation

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<sup>2</sup> Order at ¶12.

<sup>3</sup> *National Exchange Carrier Association (NECA) Submits Proposed Allocation Factor for Inbound Two-Line Captioned Telephone Calls for Compensation from the Interstate Telecommunications Relay Services (TRS) Fund for July 2005 through June 2006*, Public Notice, DA No. 05-2346 (August 24, 2005).

<sup>4</sup> Order at ¶12.

factor, patterned after NECA's submission, seems to suggest application of this factor to the period from July 2005 through June 2006. We anticipate that the Commission will resolve this discrepancy when it issues its final Order on the allocation factor.

Ultratec appreciates the opportunity to provide comments on the above matters.

Respectfully submitted,

/s/

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